



Department of Energy

ROCKY FLATS OFFICE
P.O. BOX 928
GOLDEN, COLORADO 80402-0928

AUG 20 1990

Mr. Robert Shankland
U.S. Environmental Protection Agency, Region VIII
999 18th Street
Suite 500 (8WM-C)
Denver, Colorado 80202-2405

90-DOE-8081

Dear Mr. Shankland:

Enclosed for your review are two items relating to the Rocky Flats Plant's ongoing surface water discharges under our National Pollutant Discharge Elimination System (NPDES) Permit No. CO00001333. The first item transmits data relating to biochemical oxygen demand sampling at our sewage treatment plant (STP), while the second item relates to our current plan to institute recycling of water that would otherwise be discharged from Terminal Pond C-2.

The data for biochemical oxygen demand includes information on 5-day biochemical oxygen demand (BOD-5) as well as 5-day carbonaceous biochemical oxygen demand (CBOD-5). These data were collected both from the current NPDES monitoring point in Pond B-3 and from the STP outfall itself. You will note that recent data for CBOD-5 for the STP outfall are well below 10 mg/l on a consistent basis. We believe this provides a technical basis for the movement of the NPDES monitoring point for biochemical oxygen demand from Pond B-3 to the STP outfall, and for the use of CBOD-5 as the relevant measurement for biochemical oxygen demand at this latter point. Both actions are contemplated under the draft Clean Water Act Federal Facility Compliance Agreement for the Plant. We ask that you review the enclosed data for adequacy in light of the draft Agreement, and forward to us any questions or concerns you may have regarding these data.

The second item that we have forwarded for your consideration is a proposal we received from our contractor regarding the recycling of water from Pond C-2. Briefly, this proposal entails the pumping of water that accumulates in Pond C-2 back into the Plant's process water loop for use in applications such as cooling towers. The water from Pond C-2 will not be allowed to enter the Plant's potable water supply. Discharge of any water not consumed will take place as blowdown from the cooling towers, which will enter the STP. By taking this step we hope to minimize if not eliminate the need to discharge from Pond C-2. We ask that you review our proposal for any regulatory concerns that you may have, most specifically relating to any changes or additions to our current NPDES monitoring program that might be required when the planned recycling of Pond C-2 is implemented.

ADMIN RECCRD

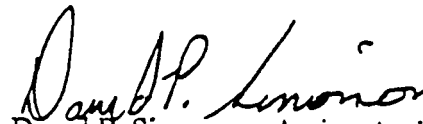
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Mr. Rboert Shankland

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If you have any questions, please feel free to contact me or have your staff contact Tom Lukow of my staff at 966-4561.

Sincerely,

A handwritten signature in dark ink, appearing to read "David P. Simonson". The signature is written in a cursive style with a large initial "D".

David P. Simonson, Acting Assistant Manager
for Environmental Management

Enclosures

cc w/o Enclosures:
J. Rampe, DOE/RFO
F. Hobbs, EG&G/RF